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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

KER'RAH CHAUN'TEL PETE,
Plaintiff,

v.
HOUSTON METHODIST HOSPITAL / TEXAS MEDICAL CENTER,
Defendant.

Case No. _____
Judge _____

COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

Plaintiff Ker'rah Chaun'tel Pete, proceeding pro se, ("Plaintiff" or "Ms. Pete") for her Complaint against Defendant HOUSTON METHODIST HOSPITAL / TEXAS MEDICAL CENTER ("Defendant" or "Houston Methodist"), alleges as follows:

I. JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction over Plaintiff's federal claims pursuant to 28 U.S.C. § 1331 (federal question jurisdiction) and 28 U.S.C. § 1343(4) (civil rights).
2. This Court has jurisdiction over Plaintiff's state-law claims under 28 U.S.C. § 1367(a) (supplemental jurisdiction).
3. Venue is proper in this district under 28 U.S.C. § 1391(b) because Defendant resides and conducts business in this district and the events giving rise to this action occurred in this district.

II. PARTIES

4. Plaintiff Ker'rah Chaun'tel Pete is an individual and resident of Jefferson County, Texas. At all times relevant, she was employed by Defendant as a Certified Nursing Assistant ("CNA").
5. Defendant Houston Methodist Hospital / Texas Medical Center is a non-profit healthcare institution organized under the laws of Texas, with its principal place of business at 6560 Fannin, Houston, Texas 77030. Defendant may be served with process through its registered agent or at its principal place of business.

III. FACTUAL ALLEGATIONS

6. Plaintiff is an African-American woman and a member of a protected class under Title VII of the Civil Rights Act of 1964 and the Texas Commission on Human Rights Act.
7. Plaintiff was hired by Defendant on or about [date], and performed her job duties satisfactorily and in compliance with all policies and procedures as a CNA.
8. Beginning on or about [date], Plaintiff was subjected to disparate treatment, including:
 - a. Unequal disciplinary standards and performance evaluations compared to similarly situated non-minority employees;
 - b. Derogatory remarks and stereotyping by supervisors and co-workers concerning her race and gender;
 - c. Exclusion from meetings, trainings, and decision-making opportunities afforded to others.
9. On or about [date], Defendant unlawfully removed Plaintiff from her position, purportedly for performance-related reasons, but in fact in retaliation for her complaints about discriminatory treatment.
10. Plaintiff repeatedly complained internally and sought to resolve the discrimination, to no avail.
11. On [date], Plaintiff timely filed a Charge of Discrimination with the Equal Employment

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Opportunity Commission (“EEOC”), asserting race and gender discrimination and unlawful constructive discharge.

12. On [date], the EEOC issued Plaintiff a Notice of Right to Sue. This Complaint is filed within 90 days of receipt of that notice.

IV. CAUSES OF ACTION

Count I: Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e et seq. (Race and Gender Discrimination)

13. Plaintiff re-alleges and incorporates by reference all preceding paragraphs.

14. Defendant is an “employer” within the meaning of Title VII.

15. Defendant subjected Plaintiff to adverse employment actions because of her race and gender, in violation of 42 U.S.C. §§ 2000e-2(a)(1) and (2).

16. These actions deprived Plaintiff of equal employment opportunities and otherwise adversely affected the terms, conditions, and privileges of her employment.

Count II: 42 U.S.C. § 1981 (Racial Discrimination in Contractual Relations)

17. Plaintiff re-alleges and incorporates by reference all preceding paragraphs.

18. Under § 1981, Plaintiff had the right to make and enforce contractual relations free from racial discrimination.

19. Defendant violated Plaintiff’s § 1981 rights by subjecting her to discriminatory treatment and unlawfully removing her from her position because of her race.

Count III: Texas Commission on Human Rights Act (TCHRA), Texas Labor Code Chapter 21 (Race and Gender Discrimination)

20. Plaintiff re-alleges and incorporates by reference all preceding paragraphs.

21. Defendant is an “employer” under Tex. Lab. Code § 21.001(3).

22. Defendant engaged in unlawful employment practices by discriminating against Plaintiff on the basis of her race and gender, in violation of Tex. Lab. Code § 21.051.

Count IV: Wrongful Termination in Violation of Public Policy (Texas Common Law)

23. Plaintiff re-alleges and incorporates by reference all preceding paragraphs.

24. Public policy as expressed in state and federal law prohibits discrimination and retaliation.

25. Defendant’s termination of Plaintiff’s employment in retaliation for her complaints and protected status was wrongful under Texas common law.

Count V: Other Federal and State Labor Law Violations

26. Plaintiff re-alleges and incorporates by reference all preceding paragraphs.

27. Defendant’s conduct also violates other applicable federal and state statutes prohibiting discrimination and unlawful removal, including but not limited to the Americans with Disabilities Act (if applicable) and Age Discrimination in Employment Act (if applicable).

V. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in her favor and against Defendant as follows:

A. Compensatory damages in the amount of \$10,000,000,000;

B. Punitive damages in the amount of \$10,000,000,000;

C. Pre-judgment and post-judgment interest at the maximum legal rate;

D. Costs of suit and reasonable fees for experts;

E. Injunctive relief, including reinstatement or front pay, and any other equitable relief to which Plaintiff is entitled;

F. Such other and further relief as the Court deems just and proper.

Dated: June 5, 2025

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Respectfully submitted,

/ s/ Ker'rah Chaun'tel Pete
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